

RUBICON
Engineering Corporation

**BOEING REALTY CORPORATION
FORMER C-6 FACILITY
LOS ANGELES, CALIFORNIA**

**INTERNAL TECHNICAL MEMORANDUM
SEMI-ANNUAL ENVIRONMENTAL CHANGE AWARENESS REPORT**

**To: Ms. Stephanie M Sibbett
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**From: Brad Rogers, P. E.
Rubicon Engineering Corporation**

Date: September 19, 2005

**Subject: Environmental Change Awareness Report No. 4
March through August 2005
Boeing Realty Corporation
Former C-6 Facility
Los Angeles, California**

PURPOSE

The purpose of this memorandum is to update Boeing Realty Corporation (BRC) regarding the current environmental investigation and remediation activities and regulatory status of sites located adjacent to or in the vicinity of the Former C-6 Facility. These sites are shown in Figure 1 and are listed below.

- Del Amo Site
- Risto Los Angeles
- Ecology Control Industries
- American Polystyrene Corporation
- PACCAR Inc.
- Mighty USA
- Redman Equipment and Manufacturing Company
- Montrose Chemical Corporation (Montrose)
- Jones Chemical
- International Light Metals (ILM)

For each of these sites, regulatory oversight is provided by the United States Environmental Protection Agency, (EPA), Department of Toxic Substances Control (DTSC), or California

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Regional Water Quality Control Board, Los Angeles Region (LARWQCB). The contact information for each site is included in Attachment 1.

This update focuses on activities conducted at adjacent sites from March 2005 through August 2005. Activities conducted at adjacent sites prior to March 2005 may be discussed in this document if new information was only recently made available in the public files.

APPROACH

Documents provided by BRC and the LARWQCB were collected, reviewed, and evaluated. The documents are being compiled in an administrative index and the principal findings are summarized in this update according to the following format:

- Background
- Regulatory Oversight
- Recent Activities
- Schedule

DEL AMO SITE

Background

A 270-acre synthetic rubber facility, known as the Del Amo Site, was operated by several companies including Shell Oil Company and Dow Chemical Company from 1942 to 1972. Environmental investigations at this facility have shown that the principal chemicals of concern are benzene and chlorinated solvents. In September 1999, USEPA issued a joint Record of Decision (ROD) for the Del Amo and Montrose sites. The ROD calls for containing the NAPLs rather than cleaning up the aquifers to drinking water standards. The ROD also requires implementation of a pump-and-treat system to contain the dissolved plumes. The respondents for this site are primarily Shell Oil Company and the General Services Administration.

On May 8, 2003, EPA issued an Administrative Order to the respondents for conducting initial remedial design work. In addition to Montrose and Shell Oil, EPA will conduct groundwater modeling as outlined in the Administrative Order.

Regulatory Oversight

The Del Amo site is a Superfund site and EPA is the oversight agency. EPA considers the Del Amo and Montrose sites to be a joint site regarding groundwater investigation and remedial actions. Recently, EPA has put pressure on the LARWQCB and the owners/operators of facilities adjacent to the Del Amo and Montrose sites to further characterize the water quality of the water-bearing zones beneath these sites with emphasis on the Gage aquifer and the C-Sand.

Recent Activities

In March 2005, groundwater samples from four Hydropunch[®] locations southeast of PACCAR along the Del Amo property boundary were collected within the B-Sand, C-Sand, and/or Gage aquifer. The highest concentration of TCE detected in groundwater was within the C-Sand at

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Hydropunch[®] location SBL0490 at 4,900 ug/L. Concentrations of TCE in the Gage aquifer ranged from 13 to 770 ug/L. The TCE concentration of 770 ug/L detected directly downgradient of PACCAR is the highest concentrations reported for the Gage aquifer to date. The water table/B-Sand Hydropunch[®] samples contained the lowest concentrations of TCE ranging from less than 5 to 7.3 ug/L. The locations of the Hydropunch[®] samples and TCE concentrations for the B-Sand, C-Sand and Gage aquifer are presented in Attachment 2.

Schedule

According to BRC, additional Hydropunch[®] sampling has recently been conducted at the Del Amo site and results of the sampling will be submitted to EPA in early October 2005.

RISTO LOS ANGELES

The Risto Los Angeles facility is located at 1441 W. 190th Street in Torrance, California, immediately north and upgradient of the Former C-6 facility. Although in 1992 DTSC identified the facility for preliminary environmental assessment, no additional information has been available.

ECOLOGY CONTROL INDUSTRIES

Background

Ecology Control Industries (ECI) is located at 19500 S. Normandie Avenue in Torrance, California. The facility has been previously occupied by Lawson Enterprises, Incorporated (1962 to 1983), Major Paint Company (December 1984 to July 1985), Cal Gypsum (1985), and Andrews Pre-Fab (1986). In July 1986, three 5,000-gallon underground storage tanks (USTs), which according to the LACoDPW contained recycled solvents and thinners, were removed. These USTs were used from 1962 to 1985. Three, 8-foot diameter aboveground storage tanks (ASTs) contained methylene chloride, although no information regarding usage dates were available. Contaminants detected at the site include TCE, PCE, hydrocarbons, and styrene in soil samples; and TCE, PCE, and methylene chloride in groundwater.

Regulatory Oversight

April 4, 2005	Email from Anthony Lizzi or Earth Tech (ECI's consultant) to LARWQCB that includes the most recent soil, soil vapor, and groundwater analytical results from the subsurface site investigation conducted in February and March 2005.
April 8, 2005	Letter from LARWQCB to ECI regarding Spills, Leaks, Investigations and Cleanups (SLIC) Oversight Cost Reimbursement Account for 2005 fiscal year.
April 20, 2005	ECI submitted signed certifications to LARWQCB for the acknowledgement of receipt of oversight cost reimbursement account letter and declaration for compliance with fee title holder notification requirements.

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Recent Activities

During February and March 2005, Earth Tech, Inc., on behalf of ECI, performed a subsurface site investigation in accordance with the work plan prepared December 8, 2004 and approved by LARWQCB on January 18, 2005. A total of 42 soil gas, 67 soil, and 13 B-Sand groundwater samples were submitted for analyses. Based on the data submitted to LARWQCB, up to 250 ug/L of PCE and 5,300 ug/L of TCE were detected in groundwater. Up to 23 ug/L of PCE and 260 ug/L of TCE were detected in soil vapor. PCE and TCE concentrations were detected in soil samples at up to 110 and 250 ug/kg, respectively.

Schedule

No information was available with respect to future activities.

AMERICAN POLYSTYRENE CORPORATION

Background

American Polystyrene Corporation (APC), formerly known as Amoco Chemical and Brand Plastics, has been located at 1225 W. 196th Street in Torrance, California since 1962. These companies produced polystyrene by mixing a styrene polymer and 20% mineral oil solution (Ecology & Environment, March 21, 1987). The facility was listed under RCRA. Brand Plastics operated the facility from 1962 to 1964. An industrial waste permit was issued to Brand Plastics in 1962 for the use of a 35-foot deep dry well for the discharge of cooling water for plastic extruding machines (URS Corporation, August 3, 2004). After Brand Plastics, Amoco operated the facility from 1964 to 1993. On May 6, 1993 American Polystyrene purchased the property from Amoco. Available reports demonstrate that soil and groundwater have been impacted by the past operations. The facility has nine 10,000-gallon USTs; including eight that have been recently used to store styrene and one to store mineral oil (URS Corporation, August 3, 2004). The principal chemicals of concern are TCE, PCE, methylene chloride, and styrene.

Regulatory Oversight

January 24, 2005 LARWQCB sent a letter to American Polystyrene and Atlantic Richfield Company (ARCO) regarding review of previous chemical storage, use and disposal practices. LARWQCB requires Amoco (now ARCO and British Petroleum Amoco) to conduct quarterly groundwater monitoring/reporting and to prepare a work plan to determine the full vertical and lateral extent of soil and groundwater contamination.

Recent Activities

On April 15, 2005, Winefield & Associates, Inc. (Winfield), on behalf of APC, submitted a *First Quarter 2005 Groundwater Monitoring and Status Report* to LARWQCB. The report presents first quarter groundwater monitoring data including isoconcentration plumes for the facility's six groundwater monitoring wells screened in the Upper Bellflower Aquitard. Groundwater flow is reportedly to the southwest. Concentrations of TCE in the six groundwater monitoring wells ranged from 1,000 to 12,300 ug/L. The maximum concentration of PCE and cis-1,2-DCE detected in groundwater was 5,120 and 125 ug/L, respectively. APC states that cis-1,2-DCE,

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TCE, and PCE are compounds that are not used by APC, and have not been used at the site by any past owners. In the report, APC requested to “be removed from the financial burden of all further groundwater monitoring, assessment and/or remediation requirements.” In the January 24, 2005 letter to APC, LARWQCB reportedly determined that previous chemical use, storage and disposal practices have contaminated the soil and groundwater beneath the site prior to APC’s purchase of the property. Therefore, LARWQCB states in the letter that Amoco is a discharger and is required to conduct quarterly groundwater monitoring and perform additional environmental investigations to determine the full vertical and lateral extent of soil and groundwater contamination.

Schedule

No information was available with respect to future activities.

PACCAR (Former Trico Industries)

Background

The facility is located at 1206 West 196th Street in Torrance, California. Property use included agricultural activities (1920-1940), construction of a cesspool (1957) followed by paint manufacturing and storage of solvents by American Chemsolv. In 1974 B&W Monarch purchased the site and later Trico Industries purchased the facility from B&W in January 1981 and used the site for manufacturing and testing well completion equipment. In 1989, Trico sold the western portion (19706 S. Normandie Avenue) to Mighty USA. Hazardous materials used at the site included paints, paint thinners, and various types of lubricating and hydraulic oils. Elevated concentrations of diesel fuel, TCE, PCE, TCA, and 1,2-DCA have been detected in soil and groundwater.

Regulatory Oversight

There was no information available for review.

Recent Activities

There was no reports available for review.

Schedule

No information was available with respect to future activities.

MIGHTY USA (Former Trico Industries)

This facility is located at 19706 S. Normandie Avenue in Torrance, California and it was part of the former Trico Industries site. Mighty USA also leases the remainder of the eastern portion of the property which is owned by PACCAR. Environmental investigations were initiated at the site as early as 1987. The principal potential source of subsurface contamination, including solvents, at the site is a former cesspool located in the southwest part of the property (URS Corporation, August 3, 2004). Elevated concentrations of TCE, PCE, and methylene chloride have been detected in groundwater (SCS Engineers, November 1987; April 1988).

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Regulatory Oversight

There was no information available for review.

Recent Activities

There was no reports available for review.

Schedule

No information was available with respect to future activities.

REDMAN EQUIPMENT AND MANUFACTURING COMPANY

The Redman Equipment and Manufacturing Company (Redman) facility is located at 19800 S. Normandie Avenue in Torrance, California. According to URS (August 3, 2004), Redman manufactures new heat exchangers and cleans and repairs used heat exchangers. An inspection of the facility in 1978 revealed that Redman was discharging heat exchanger rinse water containing pollutants to an unimproved drainage ditch at the rear of the property. According to a 1979 NPDES permit the intermittent discharge of rainfall runoff from the process areas are mixed with heat exchanger hydrotesting and cleaning wastewater and conveyed to a drainage ditch that is connected to the Dominguez Channel. In 1987, two 10,000-gallon USTs (containing diesel and gasoline) were removed from the site (URS Corporation, August 3, 2004). Soil samples collected from the resulting excavation showed up to 222 mg/kg of total recoverable petroleum hydrocarbons (TRPH) beneath the former diesel tank. No other pertinent information is available.

MONTROSE CHEMICAL

Background

The Former Montrose Chemical facility is located at 20201 S. Normandie Avenue, Torrance, California. It is located immediately adjacent to and south of the Former C-6 Facility. Montrose operated a DDT-manufacturing plant at this 13-acre property from 1947 to 1982. Chemicals of concern in soil and groundwater include DDT, chloroform, chlorobenzene, benzene, pCBA, and chlorinated VOCs. In September 1999, the USEPA issued a joint Record of Decision for the Del Amo and Montrose sites. On May 8, 2003, EPA issued an Administrative Order to begin remedial design activities. Once these activities are completed, another administrative order is expected to be issued.

Regulatory Oversight

On July 5, 2005, Hargis + Associates, Inc., (H+A) on behalf of Montrose Chemical, submitted a technical memorandum to EPA summarizing the installation of 10 groundwater monitoring wells and related sampling activities.

On September 7, 2005, H+A submitted a technical memorandum to EPA summarizing the results from the installation of five Gage wells and proposed an additional investigation to

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further define the chlorobenzene and the para-chlorobenzene sulfonic acid (pCBSA) plume in the Gage aquifer.

Recent Activities

In August and September 2004, H+A installed ten groundwater monitoring wells. Five wells (one Bellflower Aquitard, two Bellflower Sand, and two in the Gage aquifer) were installed in support of the TCE data acquisition program and five wells (one Bellflower Sand and four in the Gage aquifer) were installed in support of the pCBSA data acquisition and model refinement programs. The location of these wells is presented in Attachment 3. TCE was not detected in any of the pCBSA/model refinement wells. However, TCE was detected in three of the five TCE program monitoring wells. Well MW-31, screened in the Bellflower Aquitard and Gage well G-20 did not contain detectable concentrations of TCE. TCE was detected in Bellflower Sand monitoring wells BF-34 and BF-35 at concentrations up to 2,000 and 570 ug/L, respectively. Gage monitoring well G-21 contained up to 490 ug/L of TCE.

Five of the eight pilot test wells (four extraction wells and one injection well) were installed beginning in June 2005. Due to access issues, drilling has been halted temporarily and is scheduled to resume on October 10, 2005.

Five new Gage wells (G-25 through G-29) were installed in July 2005 south of 204th Street and Del Amo Boulevard. Elevated concentrations of chlorobenzene and pCBSA have been detected. TCE was not detected in the samples collected from wells G-25 through G-29. An additional groundwater investigation is proposed by H+A to further define the chlorobenzene and pCBSA plume in the Gage aquifer. The locations of the new Gage wells along with the proposed well locations to define the downgradient chlorobenzene and pCBSA plumes are presented in Attachment 3.

The soil sampling program is nearing completion and is expected to be completed in October 2005.

Schedule

The first pilot test will begin in late September 2005 on injection well G-IW-2, located near Vermont Avenue and Del Amo Boulevard. The pilot test is scheduled for five days at a flow rate of 200 gallons per minute (gpm). The second pilot test is scheduled for early October 2005 on extraction cluster well G-EW-1 located near Normandie Avenue and Del Amo Boulevard.

The drilling activities associated with the chlorobenzene/pCBSA investigation in the Gage aquifer are expected to begin October 3, 2005 and be completed by November 4, 2005. A completion report is anticipated to be submitted to EPA by December 16, 2005.

JONES CHEMICAL

Background

The Jones Chemical facility is located adjacent to the south side of the Montrose property. In 1995, a preliminary environmental assessment (PEA) was conducted at Jones Chemical to

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determine whether current or past waste management activities have resulted in the release of hazardous substances. The PEA included a review of the history of operations at Jones Chemical, soil gas sampling, soil sampling, and risk screening. Analytes in soil included pesticides, VOCs, semi-volatiles, PCBs, and metals. Seventy-five soil gas samples were collected from 73 locations and over 150 soil samples were collected from 77 locations. No other historical information was available for review.

Regulatory Oversight

On June 3, 2005, EPA conditionally-approved the December 13, 2004 *Revised Supplemental Soil-Gas Survey Workplan* prepared by Levine-Fricke (LFR).

Recent Activities

No information available on recent activities.

Schedule

According to the EPA approval letter, Jones Chemical was to contact EPA by June 17, 2005 to schedule a start date for the soil gas survey field work. Based on information supplied by BRC, Jones Chemical is currently awaiting approval from EPA on their quality assurance project plan (QAPP) and health and safety plan (HSP) prior to initiating the soil-gas survey. Jones Chemical expects to begin the DNAPL investigation and the soil-gas survey by the end of November 2005.

INTERNATIONAL LIGHT METALS

Background

International Light Metals (ILM) is located at 19200 S. Western Avenue, bordered to the north by W. 190th Street and to the east by the Former C-6 Facility. This 67-acre property was an industrial metal processing company from the beginning of World War II to 1992. Its operations included manufacturing and processing aluminum and titanium products. The principal chemicals included VOCs such as TCE and chromium. The wastes of their operation included spent sulfuric acid and sodium hydroxide, waste oils, spent TCA, acid and caustic sludges, spent petroleum solvents, and PCBs. High concentrations of TCE and hexavalent chromium have been detected at this facility

Regulatory Oversight

December 28, 2004 TRC, on behalf of ILM, submitted a Ground Water Corrective Measures Study (CMS) Report to DTSC. The remedial alternative selected in the report proposed in-situ bioaugmentation utilizing Hydrogen Release Compound (HRC) and Bio-Dechlor Inoculum injection.

March 28, 2005 DTSC issued technical comments to TRC on the CMS report. Comments include a request for a pilot test of the proposed remedy to obtain data to demonstrate the effectiveness of the proposed remedy; adjusting injection well screen intervals; adding monitoring points to measure effectiveness of remedy; present more recent groundwater quality data; further

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groundwater investigation to define the vertical and lateral extent of contamination; seeking approval from various agencies regarding injection of amendments; and naming convention for zones in the Bellflower Aquitard.	
April 27, 2005	TRC issued a response to DTSC's March 28, 2005 comments on CMS report. TRC mentions a plan to obtain deed restriction for use of shallow groundwater as drinking water source.
May 31, 2005	Based on DTSC comments (3/28/05), TRC submitted an <i>Additional Offsite Investigation Workplan</i> to DTSC. The workplan proposes two cluster wells southeast of the former ILM facility screened in the Bellflower Upper and Lower Sand, and the Gage aquifer. According to the workplan, a site meeting was held between DTSC and TRC on March 13, 2005 to discuss well locations. The locations were reportedly reviewed by DTSC and EPA, and DTSC issued an email on May 11, 2005 approving the cluster well locations. A letter from DTSC to TRC dated July 29, 2005 approved the work plan with a condition that the proposed 2-inch monitoring wells be replaced with 4-inch monitoring wells if technical difficulties are encountered during the installation or sampling of the 2-inch diameter wells. A figure showing the proposed well locations is included as Attachment 4.
June 2005	TRC submits <i>Pilot Test Workplan for the Former International Light Metals Facility, Torrance, California, Corrective Action Consent Agreement, Docket Number, HWCA P1-98/99-002 (EPA Identification Number CAD 0320 398 622</i> to DTSC.
August 10, 2005	DTSC issues comments to TRC on their Pilot Test Workplan dated June 2005. DTSC is requesting additional information on permitting issues, monitoring parameters, well array and design, and additional lateral and vertical characterization in groundwater.
August 19, 2005	DTSC issued comments in response to TRC's April 27, 2005 comments regarding the CMS report. Comments address many of the issues discussed in the August 10, 2005 DTSC correspondence. Attachment B of this correspondence includes an internal DTSC memo from Tizita Bekele to Chia Rin Yen regarding deed restriction. The memo mentions that documentation from RWQCB granting use restriction should be provided in an addendum to the CMS as well as a discussion of potential migration of deed restricted groundwater to areas where the use of MCLS is proposed.

Recent Activities

There was no information available regarding recent activities at the site.

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Schedule

TRC is currently revising the pilot test work plan for submittal to DTSC in October 2005. According to DTSC's August 10, 2005 comments, a revised pilot test workplan was due to DTSC on September 10, 2005.

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Boeing Realty Corporation, September 7, 2005, *FW: ECAR Update etc.*, email from Stephanie Sibbett-Brutocao to Brad Rogers.

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Department of Toxic Substances Control, August 19, 2005, *Response to DTSC's Comments on the Ground Water Corrective Measures Study for the Former International Light Metals Facility, Torrance, California, Corrective Action Consent Agreement, Docket Number, HWCA P1-98/99-002 (EPA Identification Number CAD 0320 398 622. Comments submitted to Ronald Giraudi of TRC.*

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Activities, Montrose Site, Torrance, California, memorandum from Michael Palmer to Jeffrey Dhont.

Los Angeles Regional Water Quality Control Board, January 24, 2005, *California Water Code Section 13267 Order For Subsurface Investigation Of Unauthorized Discharges At Former Amoco Chemical Company Polystyrene Facility, 1225 West 196th Street, Torrance (SLIC # 214)*, prepared for American Polystyrene.

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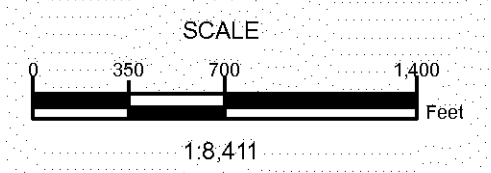
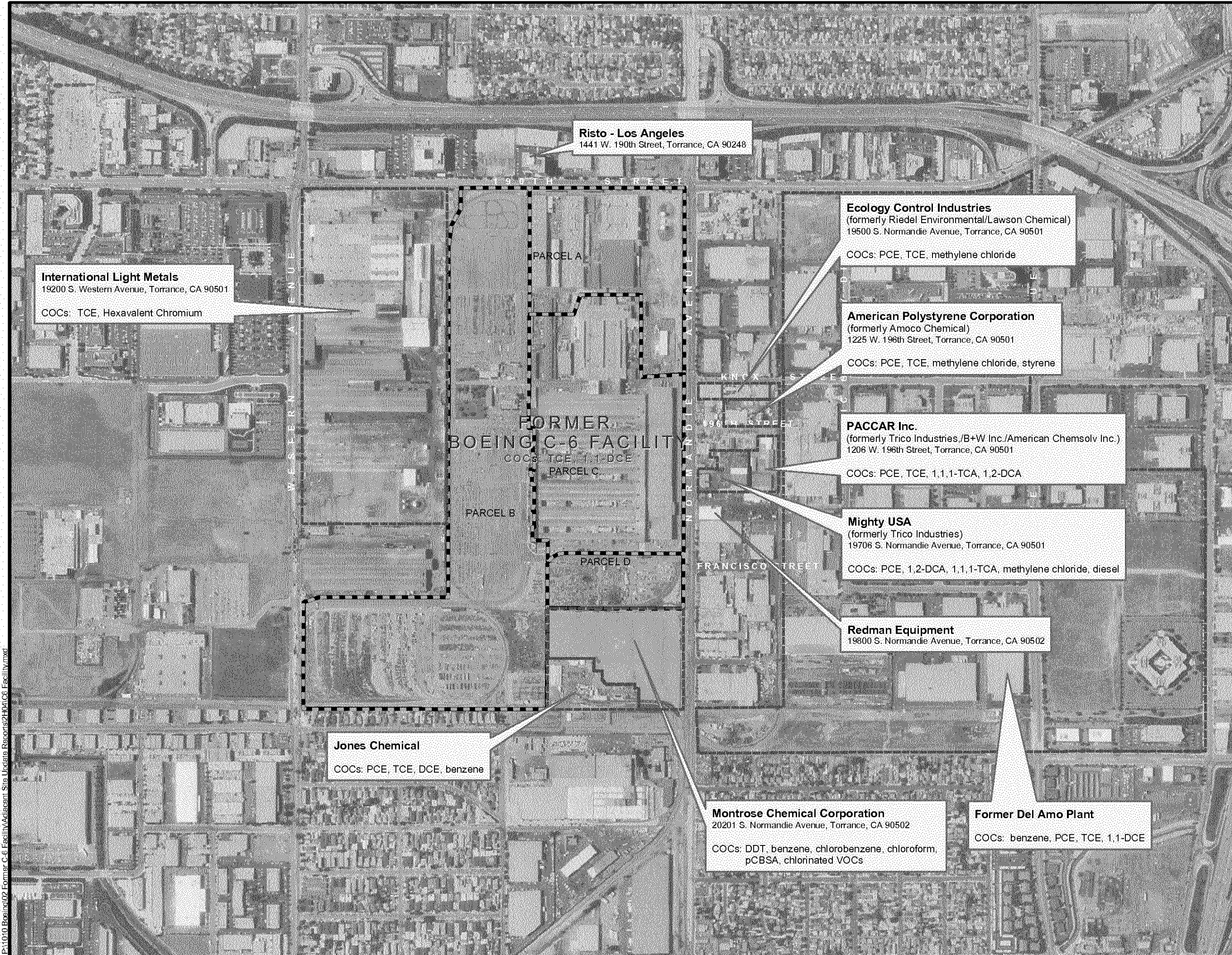
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Figure 1

Site and Vicinity Map

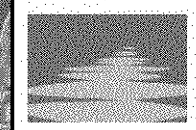


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AERIAL PHOTO SUPPLIED BY CALIFORNIA
SPATIAL INFORMATION LIBRARY (<http://gis.ca.gov/>).
NORTHEAST SECTION OF USGS TORRANCE QUADRANGLE
DATE FLOWN: MAY 31, 1994.

FIGURE 1

SITE AND VICINITY MAP

**FORMER BOEING C-6 FACILITY
TORRANCE, CALIFORNIA**



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Attachment 1

Adjacent Sites Contact Information

ATTACHMENT 1

ADJACENT SITES CONTACT INFORMATION

Site

Jones Chemical

Contact

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ILM

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ATTACHMENT 1

ADJACENT SITES CONTACT INFORMATION

Montrose

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American Polystyrene

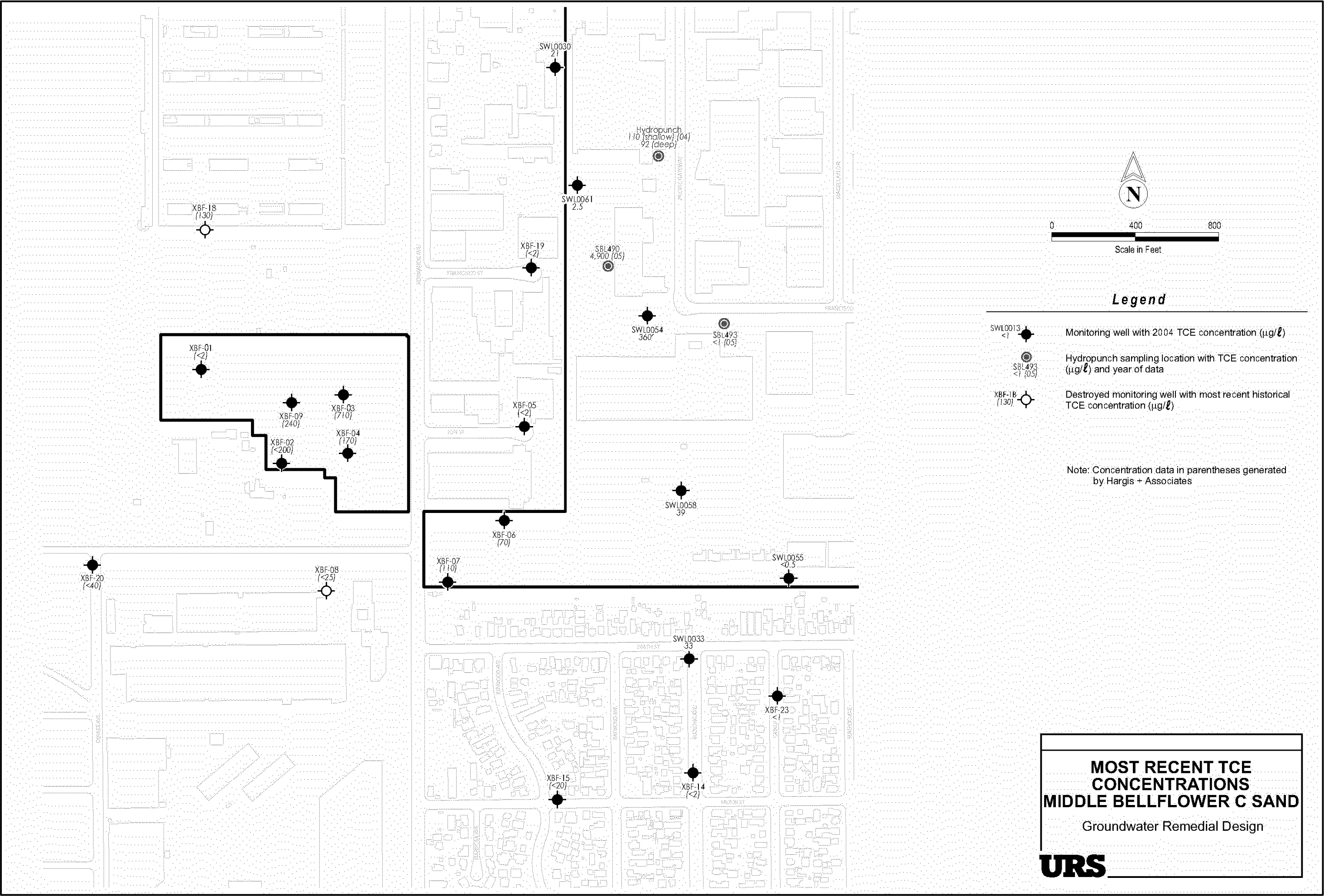
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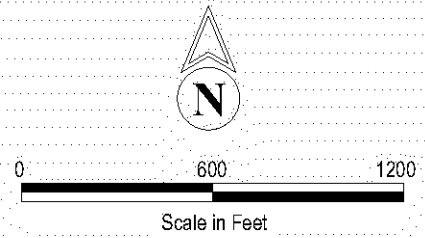
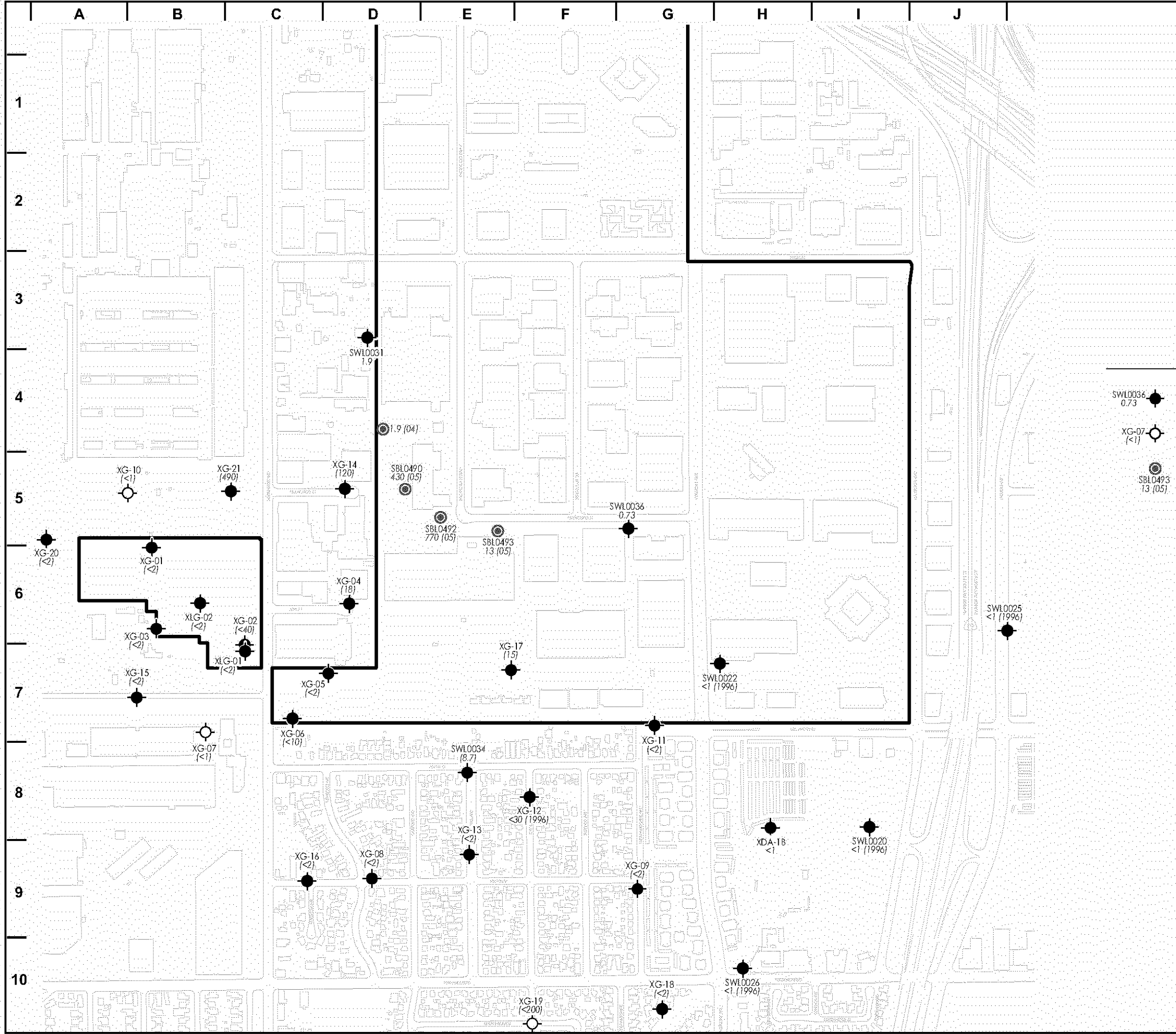
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Attachment 2

Del Amo Hydropunch[®] Locations





Legend

- Monitoring well with 2004 TCE concentration (µg/l)
- Destroyed monitoring well with most recent historical TCE concentration (µg/l)
- Hydropunch sampling location with TCE concentration (µg/l) and year of data

Note: Concentration data in parentheses generated by Hargis + Associates

MOST RECENT TCE CONCENTRATIONS

GAGE AQUIFER

Del Amo Baseline Sampling
Groundwater Remedial Design

URS

Attachment 3

New and Proposed Montrose Well Locations

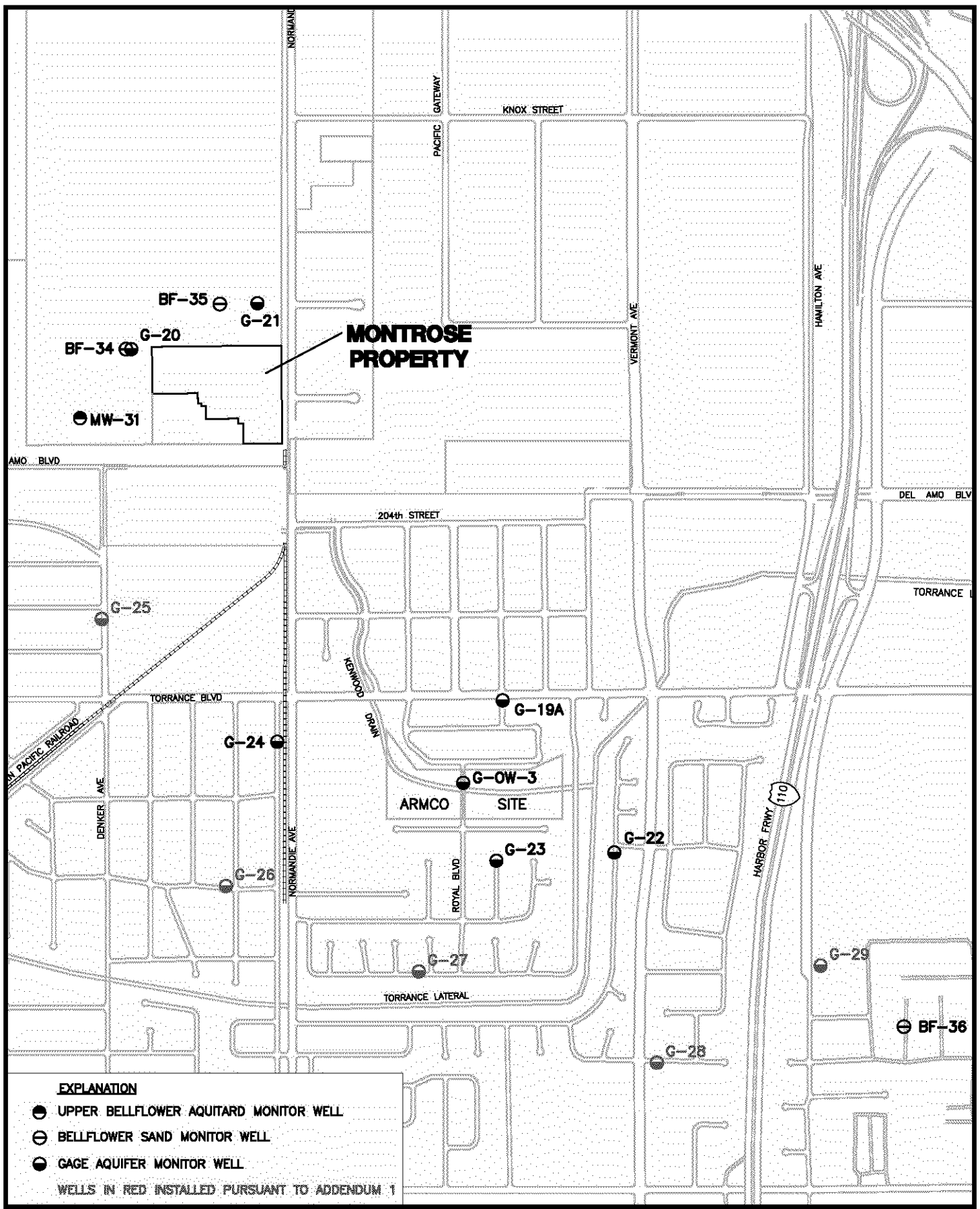


FIGURE 1.
MONITOR WELL LOCATIONS

Attachment 4

Proposed ILM Well Locations

